

1 ROBERT W. FREEMAN
2 Nevada Bar No. 3062
3 PAMELA L. MCGAHA
4 Nevada Bar No. 8181
5 LEWIS BRISBOIS BISGAARD & SMITH LLP
6 6385 S. Rainbow Boulevard, Suite 600
7 Las Vegas, Nevada 89118
8 702.893.3383
9 FAX: 702.893.3789
10
11 Attorneys for Defendant
12 Corrections Officer Trainee
13 Raynaldo-John Ramos

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

20

10 VICTOR PEREZ, as Special Administrator of
11 the Estate of CARLOS PEREZ, deceased;
12 VICTOR PEREZ, as the Guardian Ad Litem
13 for S.E.P, a minor; VICTOR PEREZ, as the
Guardian Ad Litem for A.I.P., a minor; and
MYRA PEREZ, individually.

14 Plaintiff,

15

16 STATE OF NEVADA, DIRECTOR GREG
COX, individually; WARDEN DWIGHT
17 NEVEN, individually; ASSISTANT
WARDER TIMOTHY FILSON, individually;
18 COT RAMOS, individually; LIEUTENANT
OLIVER, individually; CORRECTIONS
19 OFFICER CASTRO, individually;
CORRECTIONS OFFICER SMITH,
20 individually; and DOES I-X, inclusive; and
ROES I-X, inclusive;

Defendants.

CASE NO. 2:15-cv-1572-APG -CWH

**DEFENDANT RAYNALDO-JOHN
RAMOS' REQUEST FOR EXCEPTION
OF ATTENDANCE REQUIREMENT AT
THE SETTLEMENT CONFERENCE
SCHEDULED FOR DECEMBER 14, 2016**

23 COME NOW, Defendant, Raynaldo-John Ramos, by and through his attorneys of record,
24 Robert W. Freeman, Esq. and Pamela L. McGaha, Esq., and hereby files this Request for
25 Exception of Attendance Requirement at the Settlement Conference scheduled for December 14,
26 2016.

27 On June 17, 2016, a stay was granted as to Defendant Ramos pending the resolution of his
28 criminal case [70]. He has not participated in any formal discovery. Defendant Ramos is full time

1 employed and actively participating in the defense of the criminal charges filed against him. The
2 settlement conference was requested jointly by the Plaintiffs and the State of Nevada Defendants.
3 Based upon the above, Defendant Ramos respectfully requests that he be excused from the
4 Settlement Conference and he not be required to submit a Confidential Settlement Statement.
5 Counsel for Ramos will be present at the Conference.

6 DATED this 18th day of November, 2016.

7 LEWIS BRISBOIS BISGAARD & SMITH LLP

8 /s/ Robert W. Freeman

9 Robert W. Freeman
10 Nevada Bar No. 3062
11 Pamela L. McGaha
12 Nevada Bar No. 8181
13 6385 S. Rainbow Blvd, Suite 600
14 Las Vegas, Nevada 89118
15 Attorney for Defendant
16 Corrections Trainee Officer
17 Raynaldo-John Ramos

18
19 IT IS SO ORDERED
20 Valerie O. John
21 U.S. MAGISTRATE JUDGE
22 DATED: November 25, 2016

CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on the 18th day of November, 2016, I electronically filed the
3 **DEFENDANT RAYNALDO-JOHN RAMOS' REQUEST FOR EXCEPTION OF**
4 **ATTENDANCE REQUIREMENT AT THE SETTLEMENT CONFERENCE**
5 **SCHEDULED FOR DECEMBER 14, 2016** with the Clerk of the Court through Case
6 Management/Electronic Filing System.

7 Cal J. Potter, III, Esq.
8 C.J. Potter, IV, Esq.
9 POTTER LAW OFFICES
10 1125 Shadow Lane
Las Vegas, Nevada 89102
Attnorneys of Plaintiff

11 Steven G. Shevorski, Esq.
12 Clark G. Leslie, Esq.
13 Theresa M. Haar, Esq.
14 NEVADA ATTORNEY GENERALS OFFICE
15 100 N. Carson Street
16 Carson City, Nevada 89701
17 Attorneys for Defendants
18 the State of Nevada
19 Director James Greg Cox, Warden, Dwight Neven,
20 Assistant Warden Timothy Filson, Lieutenant Ronald Oliver

17 Jeffrey F. Barr, Esq.
18 ASHCRAFT & BARR LLP
2300 W. Sahara, Suite 1130
19 Las Vegas, Nevada 89102
20 Attorneys for Defendant
Corrections Officer Isaiah Smith

21 Craig R. Anderson, Esq.
22 MARQUIS AURBACH & COFFING
23 10001 Park Run Drive
24 Las Vegas, Nevada 89145
Atorneys for Defendant
Corrections Officer Castro

/s/ Kristen Freeman
Employee of LEWIS BRISBOIS
BISGAARD & SMITH LLP